

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

**ORDER DENYING AD HOC GROUP'S  
REQUEST FOR AN ORDER TO COMPEL PRODUCTION OF DOCUMENTS**

Upon the response (the “Response”)<sup>2</sup> of Genesis Global Holdco, LLC (“Holdco”) and certain of its affiliates, as debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), requesting entry of an order (this “Order”) denying the Ad Hoc Group’s request for an order compelling production of documents withheld on the basis of attorney work product privilege (ECF No. 709) (the “Memorandum”); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the Southern District of New York dated January 31, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the relief requested is in the best interests of the Debtors, their estates, their creditors and other parties in interest; and the Court having reviewed the Memorandum and Response and having heard

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s tax identification number (as applicable), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

<sup>2</sup> All capitalized terms used and not defined herein shall have the meanings ascribed to them in the Response.

statements in support of the relief requested therein at a hearing before the Court on September 18, 2023 (the “Hearing”); and the Court having determined that the legal and factual bases set forth in the Response and on the record of the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor;

**IT IS HEREBY ORDERED THAT:**

1. The relief requested in the Memorandum is DENIED for the reasons set forth on the record of the Hearing.
2. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.
3. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Memorandum or Response or the implementation, interpretation or enforcement of this Order.

Dated: \_\_\_\_\_, 2023  
New York, New York

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THE HONORABLE SEAN H. LANE  
UNITED STATES BANKRUPTCY JUDGE